

### REMARKS

Claim 50 is rejected under Margraff. However, the Office Action fails to provide any rationale for rejecting Claim 50. As such, appropriate correction is requested.

### Claim Rejections - 35 U.S.C. §102

Claims 37, 40-50, 53-61 and 64-72 are rejected, under 35 U.S.C. §102(b), as being allegedly anticipated by Margraff et al., (WO 01/83213 A1) (hereinafter Margraff). Applicants respectfully traverse in view of the following.

Independent Claim 37 recites an input device for accepting an unstructured user input by reading a plurality of substantially invisible codes, as claimed. In one embodiment, unstructured user input is freestyle user writing, e.g., a print element created by the user, non-keyboard user input, etc.

In contrast, Margraff discloses that a stylus may be used to select a number on an alpha-numeric keyboard disposed on the print media receiving unit (see Margraff, page 21, lines 16-17). Margraff further discloses that a stylus may be used to scan a page number of the print medium or that a user may select the page number using a stylus by using a strip of numbers present on the print media receiving unit (see Margraff, page 21, lines 18-21). The rejection asserts that these inputs are understood as unstructured input since they are not constrained to a particular type. Applicants respectfully disagree because they are constrained structurally as they require a predetermined structure, e.g., an

alpha-numeric keyboard, a scanned page number of a print medium and a selection of a number from a strip of numbers present on the print media. Accordingly, Margraff discloses receiving structured user input and not unstructured user input, as claimed. As such, Margraff fails to teach or suggest an input device for accepting an unstructured user input by reading a plurality of substantially invisible codes, as claimed.

Independent Claim 37 further recites an input device for accepting an unstructured user input by reading a plurality of substantially invisible codes, wherein the plurality of substantially invisible codes are printed on a surface, as claimed.

In contrast, Margraff discloses that the pages of the print media includes any suitable substrate material, e.g., paper or plastic (see Margraff, page 9, lines 4-5) and that print is permanently affixed to the substrate material, e.g., ink on paper (see Margraff, page 9, lines 7-8). Margraff discloses that the print medium may be a transparency (see Margraff, page 9, line 12). The rejection asserts that a transparent sheet is understood to be substantially invisible. Applicants respectfully submit that a transparent sheet, as disclosed by Margraff, fails to teach or suggest substantially invisible codes, as claimed. For example, a transparent sheet may be a transparency for an overhead that does not contain any code whatsoever. As such, a teaching of a transparent sheet, as disclosed by Margraff, fails to teach or suggest an input device for accepting an unstructured user input by reading a plurality of substantially invisible codes.

wherein the plurality of substantially invisible codes are printed on a surface, as claimed.

Independent Claim 37 further recites that a processor recognizing a plurality of print elements associated with the plurality of substantially invisible codes, as claimed. As presented above, Margraff fails to teach or suggest substantially invisible codes, as claimed. Therefore, Margraff also fails to teach or suggest a processor recognizing a plurality of print elements associated with the plurality of substantially invisible codes, as claimed.

Moreover, Margraff discloses that the processor determines the location of a selected portion of a print medium disposed on the print media receiving unit (see Margraff, page 24, lines 29-32). For example, the processor may use stored instructions for calculating the position of the stylus over the print media receiving unit (see Margraff, page 24, lines 32-33) using electronic elements under the print media receiving unit (see Margraff, page 25, lines 24-25).

Accordingly, Margraff uses electronic elements under the print media receiving unit to determine the location of a selected portion of a print medium. Electronic elements, as disclosed by Margraff, differ from substantially invisible codes, as claimed. As such, Margraff fails to teach or suggest that a processor recognizing a plurality of print elements associated with the plurality of substantially invisible codes in the claimed fashion.

Accordingly, Margraff fails to anticipate independent Claim 37, under 35 U.S.C. §102(b). Independent Claims 49 and 61 recite limitations similar to that of independent Claim 37 and are patentable for similar reasons. Dependent claims are patentable by virtue of their dependency.

As per Claims 40, 52 and 64, Margraff discloses an array of light emitters and light detectors around the inner edges of the frame (see Margraff, page 22 line 34 to page 23 line 1). The light is interrupted when a finger or a stylus is near the print medium, thereby determining the position of the selection (see Margraff, page 23, lines 1-3). Accordingly, Margraff discloses determining the position of the selection, hence the location of the stylus. Determining the position of the stylus, as disclosed by Margraff, fails to teach or suggest a stylus having an optical detector for detecting the plurality of substantially invisible codes printed on the surface, as claimed.

As per Claims 44, 56 and 68, Margraff discloses predetermined structures, e.g., an alpha-numeric keyboard, a scanned page number of the print medium, and a selectable strip of numbers present on the print media, as presented above. Thus, the print elements, as disclosed by Margraff, are not user created, as claimed. As such, Margraff fails to teach or suggest that the output device is configured to generate an audio output related to a user created print element on the surface, as claimed.

As per Claims 48, 60 and 72, Margraff discloses a stylus separate from a print media receiving unit (see Margraff, Figure 7, elements 2 and 4). The print media receiving unit includes a processor (see Margraff, Figure 6, elements 2 and 6). The receiving unit has a book like appearance (see Margraff, page 20, line 14 and see Figures 6 and 7, element 2). Thus, Margraff discloses a print media receiving unit shaped like a book having a processor and a stylus separate from the print media receiving unit. As such, Margraff fails to teach or suggest that the processor, input device, output device and writing device form a housing having a pen-like appearance, as claimed because Margraff discloses the processor being in the print media receiving unit shaped like a book.

As such, allowance of Claims 37, 40-50, 53-61 and 64-72 is earnestly solicited.

#### Claim Rejections - 35 U.S.C. §103

Claims 38, 39, 51, 52, 62 and 63 are rejected, under 35 U.S.C. §103(a), as being allegedly unpatentable over Margraff in view of Kardach (U.S. 2003/0001020) (hereinafter Kardach). Claims 38, 39, 51, 52, 62 and 63 depend from independent Claims 37, 49 and 61 and are patentable over the cited references by virtue of their dependency. As such, allowance of Claims 38, 39, 51, 52, 62 and 63 is earnestly solicited.

Claims 37-72 are rejected, under 35 U.S.C. §103(a), as being allegedly unpatentable over Silverbrook (U.S. 6,678,499) (hereinafter Silverbrook) in view

of Nagasaki et al., (U.S. 5,896,403) (hereinafter Nagasaki). Applicants respectfully traverse in view of the following.

Independent Claim 37 recites determining an instructional response, wherein the instructional response is an instruction from the computing device for use by user of the computing device, as claimed. Accordingly, in response to the user input, the computing device determines an instructional response for rendering to the user.

In the Office Action mailed on April 17, 2008, the rejection asserted that the instructional responses, as claimed are understood to be answers to questions. However, in the instant rejection, the rejection asserts that the instructional responses, as claimed are understood to be the questions. Applicants respectfully submit that the rejection is contradicting its previous admissions.

*Assuming arguendo* that the instructional responses, as claimed are understood to be questions, as alleged by the rejection. Silverbrook discloses that each examinee is required to answer the questions on the paper (see Silverbrook, col. 4, lines 55-56). Thus, the questions come from the paper, as disclosed by Silverbrook, and not from the computing device, as claimed. As such, Silverbrook fails to teach or suggest determining an instructional response, wherein the instructional response is an instruction from the computing device for use by user of the computing device, as claimed.

Independent Claim 37 further recites that in response to the recognizing, determining the instructional response, as claimed. Independent Claim 37 also recites accepting an unstructured user input by reading a plurality of substantially invisible codes and recognizing a plurality of print elements associated with the plurality of substantially invisible codes. Thus, the instructional response is provided in response to recognizing the plurality of substantially invisible codes associated with the unstructured user input.

In contrast, the rejection asserts that the instructions responses, as claimed are the questions, as disclosed by Silverbrook. The rejection further asserts that the unstructured user input, as claimed is understood as free response examination paper allowing the input of numeric expressions, values or text. Answers are responsive to the questions. Thus, using the rejection's understanding means determining the recognizing in response to the instructional response, which is opposite of what is claimed. As such, Silverbrook fails to teach or suggest in response to the recognizing, determining the instructional response in the claimed fashion.

Independent Claim 37 further recites an output device for outputting the instructional response, wherein the input device, the processor and the output device reside in a same housing, as claimed.

The rejection equates a printer, as disclosed by Silverbrook, to an output device, as claimed. The rejection admits that Silverbrook fails to teach that the input device, processor and output device reside in a same housing, as claimed. The rejection relies on Nagasaki. Applicants respectfully traverse.

Applicants respectfully submit that modifying the teachings of Silverbrook with that of Nagasaki, as suggested by the rejection, renders the teachings of Silverbrook inoperable for its intended purpose. Nagasaki discloses a pen type information reproducing apparatus (see Nagasaki, Figure 55 and col. 6, lines 26-28). Modifying Silverbrook with Nagasaki shapes the printer as a pen type information reproducing apparatus. Modifying a printer, as disclosed by Silverbrook, by a pen type reproducing apparatus, as disclosed by Nagasaki, renders the printer inoperable for its intended purpose of printing examination questions because that would require the examination questions to be printed on a very small piece of paper in order for the paper to be fed to the pen type reproducing apparatus. As such, one would not be motivated to combine the teachings of Silverbrook and Nagasaki in the claimed fashion.

Accordingly, Silverbrook alone or in combination with Nagasaki fails render independent Claim 37 obvious, under 35 U.S.C. §103(a). Independent Claims 49 and 61 recite limitations similar to that of Claim 37 and are patentable for similar reasons. Dependent claims are patentable by virtue of their dependency.



As per Claims 41, 53 and 65, Nagasaki discloses that a user traces the dot code with a pen type information reproducing apparatus (see Nagasaki, col. 9, lines 62-64). Nagasaki further discloses that the dot code can be converted into a sound that a user can hear (see Nagasaki, col. 9, lines 64-66). Accordingly, Nagasaki discloses receiving dot codes and converting the dot codes into a sound. The dot code, as disclosed by Nagasaki, is fixed and unchanged, therefore different from an unstructured user input, as claimed. As such, Nagasaki fails to teach or suggest that the output device is an audio output device operable to output an audio instructional response based on the unstructured user input, as claimed. Claims 42-48, 54-60 and 66-72 are patentable by virtue of their dependency.

As per Claims 42, 54 and 66, Nagasaki discloses providing auditory teaching material. Thus, Nagasaki merely outputs audio information that is educational in nature, e.g., teaching materials for foreign languages, musical scores, repair manuals, etc. The rejection asserts that instruction pertaining to operating a fax is understood to be asking a user to perform an action, as dictated, thus it is a task, as defined. Applicants respectfully disagree because by that analogy the user is tasked to carry out every educational instruction in a thousand page user manual when a user is provided with the user manual. For example, a user may be provided with instructions on "how" to automatically send a fax on a given day at a given time but this educational instruction does not task the user to literally setup automatic faxing on a given day at a given

time. Thus, Nagasaki fails to either teach or suggest that a task is audibly presented to the user by the audio output device, as claimed. Claims 43, 47, 55, 59, 67 and 71 are patentable over the cited combination under similar rationale.

As per Claims 48, 60 and 72, modifying the teachings of Silverbrook with that of Nagasaki, as suggested by the rejection, renders the teachings of Silverbrook inoperable for its intended purpose, as presented above. Thus, Silverbrook alone or in combination with Nagasaki fails to teach or suggest that a writing device that comprises an output device where the writing device forms a housing, as claimed.

As such, allowance of Claims 37-72 is earnestly solicited.

For the above reasons, the Applicants request reconsideration and withdrawal of the rejections under 35 U.S.C. §102 and 35 U.S.C. §103.

### CONCLUSION

In light of the above listed remarks, reconsideration of the rejected Claims is requested. Based on the arguments presented above, it is respectfully submitted that Claims 37-72 overcome the rejections of record and, therefore, allowance of Claims 37-72 is earnestly solicited.

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Respectfully submitted,  
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